

MEMORANDUM

TO:

The Commission

Staff Director

General Counsel
Press Office

Public Disclosure

FROM:

Commission Secretary's Offic

DATE:

May 30, 2012

SUBJECT:

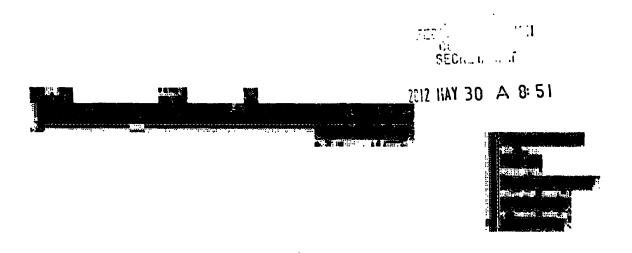
Comments on Draft AO 2012-20

(Markwayne Müllin)

Transmitted herewith are timely submitted comments from Jason Torchinsky and Shawn Shawhy, counsel for the requestor.

Draft Advisory Opinion 2012-20 was on the May 24, 2012 open meeting agenda.

Attachment



May 29, 2012

Office of the Commission Secretary Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: Advisory Opinion 2012-20 (Mullin) - Draft B

Dear Commission Secretary,

These comments are in response to Draft B of Draft AO 2012-20 issued on May 29, 2012.

After reviewing the draft, we urge the Commission to adopt Draft B. This draft is consistent with the constitutional limits of the reach of the FECA, and is in accordance with the statutory framework the Commission is charged with enforcing.

We believe that under the unique facts and circumstances presented in this request, Draft B reaches the correct result.

Sincerely,



Jason Torchinsky
Shawn Sheehy
Counsel to Markwayne Mullin